

EXHIBIT 91

12/5/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Subject to Protective Order

Sy Choudhury

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)

)

Individual and)

Representative)

Plaintiffs,)

)

v.)

)

META PLATFORMS, INC.,)

)

Defendant.)

)

Case No. 3:23-cv-03417-VC

** HIGHLY CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER **

Videotaped Deposition of SY CHOUDHURY

San Francisco, California

Thursday, December 5, 2024

Reported Stenographically by
Michael P. Hensley, RDR, CSR No. 14114

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1 Q. I'm afraid you have to share it.

2 A. I -- what's the question again?

3 Q. The question was do you believe that Meta
4 should protect human creativity rather than exploit
5 it?

6 ATTORNEY HARTNETT: Are you asking for his
7 personal opinion?

8 ATTORNEY PRITT: Yes. This is his
9 personal deposition.

10 THE WITNESS: I don't really have an
11 opinion --

12 ATTORNEY HARTNETT: Objection to form.
13 Go ahead.

14 THE WITNESS: -- whether Meta should or
15 should not have that. There are some things I have
16 an opinion on. Some things I really don't care.

17 BY ATTORNEY PRITT:

18 Q. Do you not care whether Meta protects
19 human creativity rather than exploits it in
20 connection with its LLMs?

21 ATTORNEY HARTNETT: Object to the form.

22 THE WITNESS: It's not something that I've

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1 given a lot of thought to; so my answer is I don't
2 care at this point.

3 BY ATTORNEY PRITT:

4 Q. Did anyone other than the leaker express
5 that they cared about whether Meta protected human
6 creativity rather than exploited it in connection
7 with its LLMs?

8 ATTORNEY HARTNETT: Object to the form.

9 THE WITNESS: I can't recall who the other
10 two folks I would've thought were, but there must
11 have been another two because I wouldn't have
12 written three.

13 BY ATTORNEY PRITT:

14 Q. If you look at the top of the next page,
15 Mr. Gamido says, "The agenda behind the article I
16 believe" -- do you understand him to be referring to
17 "The New York Times" article?

18 A. I imagine so.

19 Q. [As Read] The agenda behind "The
20 New York Times" article is obvious, but I
21 think the data need urgency is accurately
22 reflected. These models are very data

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1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Michael P. Hensley, Registered Diplomate

4 Reporter for the State of California, CSR No. 14114,

5 the officer before whom the foregoing deposition was

6 taken, do hereby certify that the foregoing

7 transcript is a true and correct record of the

8 testimony given; that said testimony was taken by me

9 stenographically and thereafter reduced to

10 typewriting under my direction; that reading and

11 signing was not requested; and that I am neither

12 counsel for, related to, nor employed by any of the

13 parties to this case and have no interest, financial

14 or otherwise, in its outcome.

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Michael P. Hensley, CSR, RDR